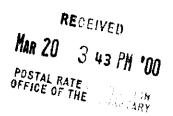
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D. C. 20268-0001



POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC. TO UNITED STATES POSTAL SERVICE WITNESS KAREN MEEHAN (ADVO/USPS-T11-4-5)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to United States Postal Service witness Karen Meehan. If the witness is unable to respond to any interrogatory, we request that a response be provided by appropriate USPS witness capable of providing an answer.

Respectfully submitted,

John M. Burzio

Thomas W. McLaughlin

Burzio & McLaughlin

1054 31st Street, N.W. Washington, D. C. 20007

Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Thomas 🚧. McLaughlin

March 20, 2000

ADVO, INC. INTERROGATORIES TO USPS WITNESS KAREN MEEHAN

ADVO/USPS-T11-4. Please refer to your Base Year 1998 (USPS Version) Letter Carrier Route Worksheet 7.0.4.1. Please confirm that the following table accurately reflects the accrued cost factors shown in that worksheet for the following route types (note that "Foot" combines business, residential, and mixed foot routes). If you cannot confirm, please provide the correct figures.

	FOOT	BUS.MOT.	RES.CURB	RES.P&L	MIX.CURB	MIX.P&L
Load	49.35%	30.59%	47.64%	35.27%	35.61%	33.22%
Street Support	15.23%	16.77%	18.54%	17.79%	17.82%	12.81%
Driving Time	2.16%	27.94%	8.85%	11,23%	20.09%	18.59%
Route/Access (FAT)	32.51%	20.00%	9.30%	33.20%	20.34%	32.88%
Route/Access (CAT)	0.44%	4.70%	15.59%	2.22%	5.43%	2.27%
Collection	0.31%	0.00%	0.08%	0.29%	0.71%	0.23%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

ADVO/USPS-T11-5. Please refer to the Base Year 1996 (USPS Version) Letter Carrier Route Worksheet 7.0.4.1 of USPS witness Alexandrovich, USPS-T-5, in Docket R97-1. Please confirm that the following table accurately reflects the accrued cost factors shown in that worksheet for the following route types (note that "Foot" combines business, residential, and mixed foot routes). If you cannot confirm, please provide the correct figures.

	FOOT	BUS.MOT.	RES.CURB	RES.P&L	MIX.CURB	MIX.P&L
Load	44.98%	15.69%	37.05%	19.78%	26.14%	24.53%
Street Support	13.32%	17.02%	13.98%	16.58%	18.23%	17.42%
Driving Time	1.93%	20.40%	6.43%	7.33%	7.95%	11.76%
Route/Access (FAT)	37.54%	38.40%	10.65%	49.43%	28.38%	38.73%
Route/Access (CAT)	1.46%	3.79%	31.51%	5.95%	17.04%	6.74%
Collection	0.76%	4.70%	0.38%	0.93%	2.26%	0.82%
Total	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%